

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Valley Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

City of Harrisonburg
Resource Recovery Facility
1630 Driver Drive
Harrisonburg, Virginia
Permit Number: VRO81016

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, the City of Harrisonburg has applied for a renewal of the Title V Operating Permit for its Resource Recovery Facility. The Department has reviewed the application and has prepared a Title V Operating Permit.

Engineer/Permit Contact: _____ Date: 01/05/04

Janardan R. Pandey, P. E.
(540) 574-7817

Air Permit Manager: _____ Date: 01/05/04

Sharon G. Foley, P.E.

Deputy Regional Director: _____ Date: 01/06/04

Larry M. Simmons, P.E.

FACILITY INFORMATION

Permittee

City of Harrisonburg
320 East Mosby Street
Harrisonburg, Virginia 22801

Facility

Resource Recovery Facility
1630 Driver Drive
Harrisonburg, Virginia 22801

AIRS Identification Number: 51-660-0118

SOURCE DESCRIPTION

SIC Code: 4961 - Steam and Air-Conditioning Supply

The Resource Recovery Facility (RRF) combusts municipal waste in municipal waste combustion units (MWCUs) and natural gas/distillate oil in boilers in order to supply steam and chilled water to the James Madison University (JMU) campus. Any steam that is produced in excess of JMU's needs is diverted to a turbine for electrical power generation, and then sold to the Harrisonburg Electric Commission.

The existing Title V permit for the facility was issued on January 14, 1998 and expires on January 14, 2003. The existing Title V permit allows operation of two natural gas/distillate oil fired boilers (rated each at 43.2 MMBtu/hr) and two MWCUs, rated each at 50 tons/day.

CHANGES TO EXISTING TITLE V PERMIT

On June 25, 2002, City of Harrisonburg submitted an air permit application to reconstruct the City's Resource Recovery Facility. On March 25, 2003, DEQ issued a state major permit to modify the RRF. This permit superseded the requirements of the NSR permits dated October 15, 1997 and October 5, 1998 which were previously issued to the facility. This permit modification allows the City of Harrisonburg to make the following changes at the facility:

- Replacing each existing MWCU with two new units each with a capacity of 100 tons/day.
- Increase in distillate oil throughput for its two boilers. Reducing the maximum sulfur content in No. 2 oil from 0.5 to 0.05 %. There were no changes in natural gas throughput.
- Installation of a shredder (internal combustion engine) which will be used as necessary to reduce the size of municipal waste.

The proposed Title V permit incorporates the new applicable requirements from the March 25, 2003 permit. The facility is a Title V major source of CO, NO_x and HCl. This source is located in an attainment area for all pollutants.

COMPLIANCE STATUS

The Resource Recovery Facility is inspected once a year.

The facility was last inspected on February 12, 2003, and was determined to be in compliance. Currently, the Resource Recovery Facility is not operating due to the construction of new facilities. Commencement of operation is anticipated by January 2004.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following :

Table I. Significant Emission Units.

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
3	ST3	English Boiler (constructed 1996-1997)	43.2 MMBtu/hr	Low NO _x Burner	#3 LNB	NO _x	3/25/03
4	ST4	English Boiler (constructed 1996-1997)	43.2 MMBtu/hr	Low NO _x Burner	#4 LNB	NO _x	3/25/03
8	ST8	Kamptech Terminator 5000 Universal Roller Shredder	1.075 MMBtu/hr	—	—	—	3/25/03
Municipal Waste Combustion Units							
1	ST1	Barlow Projects Municipal Waste Combustion Unit (MWCU)	100 tons/day	Fabric Filter ----- Dry-Dry Flue Gas Scrubbing System ----- Carbon Injection System	# 1 FF ----- # 1 FGSS ----- # 1 CIS	PM, PM-10 ----- HCl, SO ₂ ----- Mercury, Dioxin	3/25/03
2	ST2	Barlow Projects Municipal Waste Combustion Unit (MWCU)	100 tons/day	Fabric Filter ----- Dry-Dry Flue Gas Scrubbing System ----- Carbon Injection System	# 2 FF ----- # 2 FGSS ----- # 2 CIS	PM, PM-10 ----- HCl, SO ₂ ----- Mercury, Dioxin	3/25/03

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement

EMISSIONS INVENTORY

A copy of the 2002 annual emission inventory is attached as Attachment A. Emissions are summarized in the following tables.

Table II. 2002 Actual Criteria Pollutant Emissions for the Resource Recovery Facility.

	Criteria Pollutant Emissions (tons/yr)				
	VOC	CO	SO ₂	PM-10	NO _x
Fuel Burning Equipment	0.3	1.3	0.2	0.1	1.8
Municipal Waste Incinerators	1.1	15.0	37.9	2.3	26.9
Total	1.4	16.3	38.1	2.4	28.7

Table III. 2002 Actual Hazardous Air Pollutant Emissions for the Resource Recovery Facility.

Pollutant	Hazardous Air Pollutant Emissions (tons/yr)
Hydrogen Chloride (HCl)	70.0

EMISSION UNIT APPLICABLE REQUIREMENTS

Fuel Burning Equipment Requirements (Two Boilers) - Units # 3 & 4

Limitations:

The following limitations are state BACT and/or other applicable requirements from the state major NSR permit dated March 25, 2003. Please note that the condition numbers are from the 2003 permit; a copy of the permit is enclosed as Attachment B.

Condition 6: NO_x emissions shall be controlled by flue gas recirculation with low NO_x burners.

Condition 26: Limit on the types of fuels to be combusted in the boilers. Natural gas and distillate oil are the only approved fuels.

Condition 28: Limit on fuel consumption.

Condition 30: Limit on the sulfur content of distillate oil to be combusted. Sulfur content shall not exceed 0.05% by weight, per shipment.

Condition 32: Hourly emission limits for criteria pollutants.

Condition 33: Annual emission limits for criteria pollutants.

Condition 35: Visible emission limit of 10%, except during one six-minute period in any hour where visible emissions shall not exceed 20%.

Condition 37: Boiler emissions shall be controlled by proper operation and maintenance. Written operating procedures and a maintenance schedule shall be maintained.

Monitoring and Recordkeeping:

The monitoring and recordkeeping requirements in Conditions 31, 37, 63 b., 63 d., 63 l. and 63 m. of the state major NSR permit, dated March 25, 2003, have been included in the permit.

The permittee will monitor the sulfur content of the each shipment of distillate oil, and will maintain certifications from each fuel supplier that demonstrates compliance with the 0.05%, by weight, requirement.

The permittee will keep records of daily and annual throughput of each type of fuel.

Actual emissions from the operation of the two boilers will be calculated using the following equations:

For natural gas combustion:

$$E = F \times N$$

..... Equation 1

Where:

E = Emission Rate (lb/time period)
 F = Pollutant specific emission factors as follows:

PM	=	7.6 lb/million ft ³
PM-10	=	7.6 lb/million ft ³
SO ₂	=	0.6 lb/million ft ³
CO	=	84 lb/million ft ³
NO _x	=	100 lb/million ft ³
VOC	=	5.5 lb/million ft ³

N = Natural gas consumed (million ft³/time period)

For distillate oil combustion:

$$E = F \times O$$

..... Equation 2

Where:

E = Emission Rate (lb/time period)
 F = Pollutant specific emission factors as follows:

PM	=	2.0 lb/1000 gal
PM-10	=	1.0 lb/1000 gal
SO ₂	=	142 S lb/1000 gal (S = weight percent sulfur)
CO	=	5.0 lb/1000 gal
NO _x	=	20.0 lb/1000 gal
VOC	=	0.2 lb/1000 gal

O = Distillate oil consumed (1000 gal/time period)

The boilers in operation at the Resource Recovery Facility are subject to NSPS Subpart Dc. The NSPS contains requirements for SO₂ emissions. All of the SO₂ monitoring requirements (fuel monitoring requirements) from the subpart have been incorporated into the operating permit, satisfying the periodic monitoring requirement.

The hourly emission limits established for all other criteria pollutants (particulate, NO_x, CO, and VOC) are based on the capacity of the boilers. Therefore, if the boilers are operated at capacity, or below, there should not be a violation of the hourly emission rates. Calculations have been included in Attachment C to demonstrate how the limits were obtained.

The annual emission limits established for all other criteria pollutants (particulate, NO_x, CO, and VOC) are based on the fuel limit contained within the permit. Regarding these pollutants, the fuel throughput is the factor that determines emission rates. Calculations have been included in Attachment C to demonstrate that if City of Harrisonburg combusts all that is allowed in the permit, then the permit limits will not be violated. Therefore, as long as the fuel throughput limit is not violated, there is very little chance that the criteria pollutant emission limits will be violated. Recordkeeping demonstrating compliance with the fuel throughput limit can also be used to demonstrate compliance with the criteria pollutant emission limits, satisfying the periodic monitoring requirement.

The NSPS required a VEE be performed on each boiler to demonstrate compliance with the opacity limit. The VEE was performed on February 27, 1998, using the worst case fuel, distillate oil, at full capacity of the unit. The test data revealed an opacity of 0% under the above mentioned conditions. The results of the test data show that there is little likelihood of violating the opacity limitation. Therefore, as long as the boilers are operated properly it can be assumed that the opacity limitation will not be violated. The permit also requires monthly inspections to

be performed on each of the boiler stacks (Condition 55 of the state major NSR permit dated March 25, 2003). Each inspection shall include an observation of the presence of visible emissions. If during the inspection visible emission are observed, a visible emissions evaluation (VEE) shall be conducted in accordance with the 40 CFR Part 60, Appendix A, Method 9. The monthly inspections will satisfy the periodic monitoring requirement for the visible emission limitation for the two boilers. Maintenance of records demonstrating that the operators have been properly trained along with maintenance of operating procedures will ensure compliance with the opacity limitation and satisfy the periodic monitoring requirement.

Compliance Assurance Monitoring (CAM) Plan Applicability:

The CAM plan does not apply to these boilers, as none of the boiler has potential pre-controlled emissions of any pollutant that exceeds major source threshold levels.

Testing:

Other than the Method 9 test described above, the permit does not require other source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting:

The permit includes the requirement to submit fuel quality reports semi-annually. This is a requirement from NSPS Subpart Dc.

Streamlined Requirements:

The following applicable requirements have not been included for the reasons provided:

The fuel sulfur content requirement of 0.05% in the state major NSR permit (Condition 30 of 3/25/03 Permit) is more stringent than the one in NSPS Subpart Dc. Therefore, the limit from state major NSR permit has been included in the Title V permit.

Condition 38 of the state major NSR permit dated 3/25/03 has not been included as all applicable requirements from NSPS Subpart Dc have been included in the permit.

Fuel Burning Equipment Requirements (One Shredder) - Units # 8

Limitations:

The following limitations are state BACT and other applicable requirements from the state major NSR permit dated March 25, 2003. Please note that the condition numbers are from the 2003 permit; a copy of the permit is enclosed as Attachment B.

Condition 29: Limit on fuel consumption.

Condition 34: Emission limits for criteria pollutants.

Condition 36: Visible emission limit of 10%.

Condition 27: Limit on the type of fuel to be combusted in the shredder. Distillate oil is the only approved fuel.

Condition 30: Limit on the sulfur content of distillate oil to be combusted. Sulfur content shall not exceed 0.05% by weight, per shipment.

Monitoring and Recordkeeping:

The monitoring and recordkeeping requirements in Conditions 31, 63 c., 63 d., 63 l. and 63 m. of the state major NSR permit, dated March 25, 2003, have been included in the operating permit.

The permittee will monitor the sulfur content of the each shipment of distillate oil, and will maintain certifications from each fuel supplier that demonstrates compliance with the 0.05%, by weight, requirement.

The permittee will keep records of monthly and annual throughput of distillate oil.

Actual emissions from the operation of the shredder will be calculated using the following equations:

$$E = F \times O$$

..... Equation 3

Where:

E = Emission Rate (lb/time period)
 F = Pollutant specific emission factors as follows:

PM = 0.31 lb/MMBtu
 PM-10 = 0.31 lb/MMBtu
 SO₂ = 0.29 lb/MMBtu
 CO = 0.95 lb/MMBtu
 NO_x = 4.41 lb/MMBtu
 VOC = 0.35 lb/MMBtu

O = Shredder Rating (1.075 MMBtu/hr)

The hourly emission limits established for all criteria pollutants (particulate, NO_x, CO, and VOC) are based on the capacity of the shredder. Therefore, if the shredder is operated at capacity, or below, there should not be a violation of the hourly emission rates. Calculations have been included in Attachment C to demonstrate how the limits were obtained.

The annual emission limits established for all criteria pollutants (particulate, NO_x, CO, and VOC) are based on the fuel limit contained within the permit. Regarding these pollutants, the fuel throughput is the factor that determines emission rates. Calculations have been included in Attachment C to demonstrate that if City of Harrisonburg combusts all that is allowed in the permit, then the permit limits will not be violated. Therefore, as long as the fuel throughput limit is not violated, there is very little chance that the criteria pollutant emission limits will be violated. Recordkeeping demonstrating compliance with the fuel throughput limit can also be used to demonstrate compliance with the criteria pollutant emission limits, satisfying the periodic monitoring requirement.

VEE is required for the shredder once it is constructed. The permit also requires that monthly inspection to be performed on shredder stack. Each inspection shall include an observation of the presence of visible emissions. If during the inspection visible emission are observed, a visible emissions evaluation (VEE) shall be conducted in accordance with the 40 CFR Part 60, Appendix A, Method 9. The monthly inspection will satisfy the periodic monitoring requirement for the visible emission limitation for the shredder.

Compliance Assurance Monitoring (CAM) Plan Applicability:

The CAM plan does not apply to the shredder, as the shredder does not use a control device to achieve compliance with the emission limitations.

Testing:

Other than the Method 9 test described above, the permit does not require other source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting:

The permit includes the requirement to notify the construction and start-up date of the shredder (Condition 57.b of the state major NSR permit).

Streamlined Requirements:

There are no streamlined requirements.

Municipal Waste Combustion Units Requirements - Units # 1 & 2

Limitations:

The MWCUs (Ref. Nos. #1 and #2) are subject to 40 CFR 60 Subpart AAAA – Standards of Performance for Small Municipal Waste Combustion Units. All applicable limitations from Subpart AAAA have been included in the permit. The following limitations are state BACT and other applicable requirements from the state major NSR permit issued on March 25, 2003 and Subpart AAAA requirements. Please note that the condition numbers are from the 2003 permit; a copy of the permit is enclosed as Attachment B.

Condition 3: Particulate emissions shall be controlled by fabric filters.

Condition 4: Acid gas (HCl and SO₂) emissions shall be controlled a dry-dry flue gas scrubbing system.

Condition 5: Mercury and dioxins/furans emissions shall be controlled by a carbon injection system.

Condition 14: Limit on the types of material to be incinerated in the MWCUs.

Condition 15: Limit on amount of solid waste incinerated each year.

Condition 16: Approved fuels for the auxiliary burner at each MWCU.

Condition 17: Short term emission limits for Dioxin/Furans, Cadmium, Lead, Mercury, Opacity, Particulate Matter (PM), Hydrogen Chloride (HCl), Nitrogen Oxides (NO_x), Sulfur Dioxide (SO₂), Carbon Monoxide (CO) and Fugitive Ash.

Condition 18: Application of emission limits contained in Condition 17 regarding start-up, shut down and malfunction.

Condition 19: Hourly and Annual emission limits for PM, PM-10, NO_x, SO₂, CO, VOC and HCl.

Condition 20: Requirements for operator training.

Condition 21: Plant-specific employee training requirements.

Condition 22: Plant-specific training manual requirements.

Condition 23: Operator certification requirements.

Condition 24: Good combustion practice requirements for MWCUs.

Monitoring and Recordkeeping:

As per 40 CFR Part 64 Compliance Assurance Monitoring (CAM), emission limitations or standards proposed after November 15, 1990 pursuant to section 111 or 112 are exempt from CAM (40 CFR §64.2(b)(1)). All applicable monitoring requirements from Subpart AAAA have been included in the permit. Since Subpart AAAA was promulgated on December 2001 under the authority of Section 111 New Source Performance Standards (NSPS), this standard is exempt from CAM requirements, and no additional monitoring has been incorporated into the Title V permit.

The monitoring requirements in Conditions 7, 8, 9, 10, 11, 12, 13, 39, 40, 41, 42, 43, 44, 45, 46, 47, of the state major NSR permit, dated March 25, 2003, have been incorporated in this permit. These monitoring requirements will meet Part 70 requirements.

The permittee is required to install continuous emission monitoring systems CEMS to measure and record the concentration of SO₂ and CO emitted by each of the MWCUs. This will satisfy the periodic monitoring requirement for the SO₂ and CO emission limit contained within the permit for each MWCU.

The permittee will operate a continuous opacity monitor to demonstrate compliance with the Standard for Visible Emissions requirement. The continuous opacity monitors will also satisfy the periodic monitoring requirements for the opacity.

Compliance with the short term emission limits established for dioxin/furans, cadmium, lead, mercury, opacity, particulate matter (PM), hydrogen chloride (HCl), Nitrogen Oxides (NO_x), Sulfur dioxide, carbon monoxide and fugitive ash shall be determined by initial and annual stack tests required in the permit.

The hourly and annual emission limits established for PM-10, PM, SO₂, NO_x, CO and HCl are based on the short term emission limits. Calculations have been included in Attachment D to demonstrate how the limits were obtained.

The hourly and annual emission limits established for VOC are based on the capacity of the MWCU. Therefore, if the MWCU is operated at capacity, or below, there should not be a violation of the hourly and annual emission rates. Calculations have been included in Attachment D to demonstrate that if City of Harrisonburg combusts all the solid waste that is allowed in the permit, then the emission limits will not be violated. Therefore, as long as the solid waste throughput limit is not violated, there is very little chance that the emission limits for VOC will be violated. Recordkeeping demonstrating compliance with the solid waste throughput limit can also be used to demonstrate compliance with VOC emission limits, satisfying the periodic monitoring requirement.

Actual emissions from the operation of the each MWCU will be calculated using the following equations:

1. For PM and PM-10:

$$E = F \times N \times Q \times (1 \text{ gm}/1000 \text{ mg}) \times (1 \text{ lb}/453.6 \text{ gm}) \times (60 \text{ min}/1 \text{ hr})$$

.....Equation 4

Where:

E = Emission Rate (lb/hr)
 F = Pollutant specific emission factors from stack test (mg/dscm)
 Q = MWCU Air Flow (mg/dscm)

2. For SO₂, CO, NO_x and HCl:

$$E = F \times O \times M.W. \times Q \times (1 \text{ L}/1,000,000 \text{ L}) \times (1000 \text{ L}/\text{m}^3) \times (1 \text{ lb}/453.6 \text{ gm}) \times (60 \text{ min}/1 \text{ hr})$$

.....Equation 5

Where:

E = Emission Rate (lb/hr)
 O = Pollutant specific emission factors from stack test (ppm)
 Q = MWCU Air Flow (mg/dscm)
 M.W. = Molecular Weight (g/mol) as follows

SO₂ = 64 g/mol
 CO = 28 g/mol
 HCl = 36.5 g/mol
 NO_x = 44 g/mol

3. For VOC:

$$E = F \times O$$

.....Equation 6

Where:

E = Emission Rate (lb/time period)
 F = Pollutant specific emission factors as follows:

VOC = 0.1 lb/ton

O = Solid waste incinerated (ton/time period)

Compliance Assurance Monitoring (CAM) Plan Applicability:

The CAM plan does not apply to MWCUs (Ref. Nos 1 and 2) as these units are subject to emission limitations in New Source Performance Standards (NSPS) proposed after November 15, 1990. These MWCUs are subject to NSPS Subpart AAAAA that was effective on December 6, 2001.

Recordkeeping:

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. The recordkeeping requirement contained in Title V permit has been incorporated from Condition 63 of the state major new source review permit dated March 25, 2003.

Testing:

Initial performance and annual testing is required for each of the MWCUs. The tests are required for Dioxin/Furans, Cadmium, Lead, Mercury, Opacity, Particulate Matter (PM), Hydrogen Chloride (HCl), Nitrogen Oxides (NO_x), Sulfur Dioxide (SO₂), Carbon Monoxide (CO) and Fugitive Ash. Testing is also required for the CEMS that must be installed on each of the MWCUs. The testing required in the Title V permit has been incorporated from Conditions 48, 49, 50, 52, 53, 54, of the state major new source review permit dated March 25, 2003.

A table of test methods has been included in the permit if testing is performed beyond that required in the permit. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting:

The permit requires initial, semi-annual and annual reporting. The reporting required in Title V permit has been incorporated from Conditions 57.b, 58, 59, 60 and 61 of the state major new source review permit dated March 25, 2003.

Streamlined Requirements:

The following applicable requirements have not been included for the reasons provided:

Condition 25 of the state major NSR permit dated 3/25/03 has not been included as all applicable requirements from NSPS Subpart AAAAA have been included in the permit.

Initial notification requirements (Condition 57.a of the state major NSR permit) have not been included in the permit because the source has already completed the requirements.

Facility Wide Conditions

Limitations:

The following limitations are state BACT and other applicable requirements from the state major NSR permit dated March 25, 2003. Please note that the condition numbers are from the 2003 permit; a copy of the permit is enclosed as Attachment B.

Condition 64: Permit Invalidation requirements.

Condition 68: Violation of Ambient Air Quality Standard

Condition 69: Maintenance/Operating Procedures.

Notifications and Recordkeeping:

The notifications and recordkeeping requirements in Conditions 66 and 69 of the state major NSR permit, dated March 25, 2003, have been included in the operating permit.

Streamlined Requirements

The remaining general conditions (other than Conditions 64, 66, 68 and 69 described above) in state major NSR permit have been modified to meet the general condition requirements of 40 CFR Part 70 and 9 VAC 5-80-110

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all Federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions, including those caused by upsets, within one business day.

FUTURE APPLICABLE REQUIREMENTS

The facility is a major source of hazardous air pollutants (HCl). Maximum achievable control technology standards (MACT) for boilers, under 40 CFR Parts 61 and 63 and 9 VAC 5 Chapter 60, are scheduled for promulgation on January 2004. The facility will be subject to those requirements when promulgated.

INAPPLICABLE REQUIREMENTS

The permittee has not identified any inapplicable requirements in the application.

NSPS Subpart E, Standards of Performance for Incinerators, applies to each incinerator with a charging rate of more than 50 tons/day. The City has two units, each with a charging rate equal to 100 tons/day. However, as per 40 CFR §60.1025, Subpart E does not apply to municipal waste combustion unit (MWCU), if the unit is subject to Subpart AAAA. Since the MWCUs at the City of Harrisonburg are subject to Subpart AAAA, these units are not subject to NSPS Subpart E.

NSPS Subpart Eb, Standards of Performance for Large Municipal Waste Combustors, is not an applicable requirement for the City of Harrisonburg. The NSPS applies to each municipal waste combustor unit with a combustion capacity greater than 250 tons/day. The City has two units, each with a capacity of 100 tons/day, and the 3/25/03 state major NSR permit limits each units to burning no more than 100 tons/day (i.e. total of 200 tons/day).

COMPLIANCE PLAN

The City of Harrisonburg is currently in compliance with all applicable requirements. No compliance plan was included in the application or in the permit.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Table IV. Insignificant Emission Units.

Emission Unit No.	Emission Unit Description	Citation ¹ (9 VAC_)	Pollutant(s) Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
-	Two (2) 12,000 Gallon #2 Fuel Oil Storage Tanks	9 VAC 5-80-720 B	VOC	-
5	70 kW Natural Gas-Fired Generator	9 VAC 5-80-720 C	N/A	70 kW

¹The citation criteria for insignificant activities are as follows:

- 9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
- 9 VAC 5-80-720 B - Insignificant due to emission levels
- 9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The City of Harrisonburg did not submit a request for confidentiality. Therefore, all portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

A public notice regarding the draft permit was placed in the Daily News Record, Harrisonburg, Virginia, on November 5, 2003. EPA was sent a copy of the draft permit and notified of the public notice on November 5, 2003. West Virginia, the only affected state, was sent a copy of the public notice in a letter dated November 5, 2003. All persons on the Title V mailing list were also sent a copy of the public notice in e-mail dated November 5, 2003.

Public comments were accepted from November 5, 2003 to December 5, 2003. No comments were received from the public, the affected state and the EPA regarding the draft permit.

ATTACHMENT A

2002 Annual Emissions Update

ATTACHMENT B

**State Major NSR Permit
(dated March 25, 2003)**

ATTACHMENT C

Emission Calculations for Boilers and Shredder (Units # 3, 4 and 8)

ATTACHMENT D

Emission Calculations for Municipal Waste Combustion Units (Units # 1 & 2)